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AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND

BY

DEPUTY

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

DONNA F. COLLINS, et, al.

Plaintiff,

vs.

WAL-MART STORES EAST, LP, et, al.

Defendant.

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**NOTICE OF REMOVAL FROM
THE CIRCUIT COURT FOR
BALTIMORE COUNTY, MD
CASE NO. 03-C-13-001064 OT**

CIVIL ACTION NO.

WDQ 13 CV 05 32

PETITION FOR REMOVAL

Pursuant to 28 U.S.C., Section 1441(a), the Defendants, Wal-Mart Stores, Inc. and Wal-Mart Stores East, LP, respectively notices the removal of the above-captioned matter to this Honorable Court from the Circuit Court for Baltimore County, Maryland, and as grounds therefor states as follows:

1. On or about February 11, 2013 Defendants, Wal-Mart Stores, Inc., and, Wal-Mart Stores East, LP, were served with a Summons and Complaint in an action commenced by the Plaintiffs, Donna F. Collins and John M. Collins, in the Circuit Court for Baltimore County, Maryland as Case No. 03-C-13-001064 OT. True and correct copies of the Summons and Complaint are attached hereto as Exhibit A. No further proceedings have taken place in this action.

2. This Notice of Removal is filed within thirty (30) days of receipt of service by Defendants, Wal-Mart Stores, Inc., and, Wal-Mart Stores East, LP., and, therefore, is timely filed pursuant to 28 U.S.C., Section 1446(b).

3. Pursuant to the Federal Rules of Civil Procedure, the Petitioner has filed a written Answer to Plaintiff's Complaint on or about February 14, 2013. Copies of Defendant's Answer and Notice of Removal are attached hereto and incorporated herein by reference as Exhibit B.

4. In her Complaint, Plaintiff seeks judgment against these Defendants in the combined amount exceeding Seventy-Five Thousand Dollars (\$75,000.00) in compensatory damages, plus interest and costs.

5. At the time of commencement of this action, Plaintiff was and is now a resident of Maryland.

6. At the time of commencement of this action, and at all other times relevant to the subject proceeding, Defendant, Wal-Mart Stores, Inc.'s (the parent corporation of all Defendants) principal place of business in the United States is Bentonville, Arkansas. Wal-Mart Stores East, LP is a wholly owned entity with limited partnership of Wal-Mart Stores, Inc.


7. As this is a civil action wherein the amount in controversy exceeds \$75,000, exclusive of interest and costs, this Honorable Court has diversity of jurisdiction over this matter pursuant to 28 U.S.C., Section 1332.

8. The Petitioner presents and files herewith a check in the amount of \$350 for the filing fee, as required by law.

WHEREFORE, the Defendants, Wal-Mart Stores, Inc., and, Wal-Mart Stores East, LP, respectfully requests to remove this action from the Circuit Court for Baltimore County, Maryland to the United States District Court for the District of Maryland.

Respectfully submitted,

DeCARO, DORAN, SICILIANO,
GALLAGHER & DeBLASIS, LLP




Warren D. Stephens
17251 Melford Boulevard, Suite 200
Bowie, Maryland 20715
(301) 352-4950
Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of February, 2013, a copy of the foregoing Notice of Removal was forwarded, postage prepaid, via First Class mail, to:

Louis G. Close, III, Esquire
Christopher T. Casciano, Esquire
403 Central Avenue
Towson, Maryland 21204
Counsel for Plaintiff



Warren D. Stephens
Counsel for Defendant